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2 Federal Public Defender
3 Nevada State Bar No. 11479
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5 Assistant Federal Public Defender
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Attorney for Michael Friedman

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

| Case No. 2:16-cr-103-GMN-GWF

Plaintiff,

**MOTION TO CONTINUE SELF
SURRENDER DATE**

MICHAEL FRIEDMAN

Expedited Treatment Requested

COMES NOW defendant Michael Friedman, through his attorney, Assistant Federal Defender Brenda Weksler, hereby submits this Motion to Continue Self Surrender Date.

DATED this 15th day of December, 2017.

RENE L. VALLADARES
Federal Public Defender

By: /s/ Brenda Weksler

BRENDA WEKSLER
Assistant Federal Public Defender
Attorney for Michael Friedman

MEMORANDUM

On July 7, 2017, Michael Friedman was sentenced to serve a term of 10 months in prison (5 months in custody and 5 months of home confinement). He was ordered to self-surrender on October 6, 2017. Mr. Friedman contacted undersigned requesting an extension of 2 months for his self-surrender and explains the reasons in a letter to this Court (attached as sealed Exhibit A). In essence, his girlfriend's surgery was continued from December 12th to December 26th. The December 12th surgery date would have allowed his girlfriend the ability to be cared for by Mr. Friedman for the following 3 weeks (as he currently needs to self-surrender on January 6, 2018). With the postponement of the surgery, Mr. Friedman would only be able to care for his girlfriend, Diane Morris, for about a week. Ms. Morris has no family and very few friends that can care for her, which explains the pressing need for Mr. Friedman's request to postpone his self-surrender date one more time.

Proof of Ms. Morris' medical condition has been previously provided (and attached again as sealed Exhibit B).

Mr. Friedman is 75 years old. He does not pose a risk of danger to this community. Nor does he pose a threat of non-appearance, as evidenced by his continuous contact with undersigned in relation to his need to self-surrender. Mr. Friedman will comply with this court's orders irrespective of what this Court decides.

DATED this 15th day of December, 2017

Respectfully submitted,

RENE L. VALLADARES
Federal Public Defender

By: /s/ Brenda Weksler

BRENDA WEKSLER
Assistant Federal Public Defender
Attorney for Michael Friedman

IT IS SO ORDERED.

DATED this 4 day of January, 2018.

Gloria M. Navarro, Chief Judge
United States District Court

1 **CERTIFICATE OF ELECTRONIC SERVICE**

2 The undersigned hereby certifies that she is an employee of the Federal Public Defender
3 for the District of Nevada and is a person of such age and discretion as to be competent to serve
4 papers.

5 That on December 15, 2017, she served an electronic copy of the above and foregoing
6 **MOTION TO CONTINUE SELF SURRENDER DATE** (Expedited Treatment Requested)
7 by electronic service (ECF) to the person named below:

8
9 STEVEN W. MYHRE
10 Acting United States Attorney
11 DANIEL SCHIESS
12 Assistant United States Attorney
13 501 Las Vegas Blvd. South
14 Suite 1100
15 Las Vegas, NV 89101

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17 _____
18 */s/ Lauren Conklin*
19 Employee of the Federal Public Defender
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